

September 8, 2003

David Phillips
Nevada Power Company
6226 West Sahara Avenue
MS 30
Las Vegas, NV 89102-3032

Facility: Reid Gardner Generating Station
Moapa, NV
Facility ID: H-000530

Reference: *Background Water Quality Data for the Reid Gardner Generating Station, Moapa, Nevada* (dated June 25, 2003)

Subject: **Establishment of Action Levels**

Dear Mr. Phillips:

The Nevada Division of Environmental Protection (NDEP) has received and reviewed the referenced letter report submitted by Nevada Power Company (NPC). The referenced report includes background contaminant concentrations for contaminants of concern at the referenced facility. The background concentration for most of the analytes currently monitored at the referenced facility was determined by calculating the mathematical average of each analyte's concentrations through March of 2003 in groundwater monitoring wells IMW-2.5S, IMW-2.5D, KMW-2S, KMW-2M, and KMW-2D. Three constituents (beryllium, cadmium, and nickel) present in groundwater at the referenced facility appear to have been omitted in the background analysis.

Based on the laboratory analytical sheets from the *Discharge Monitoring Report (DMR) – Second Quarter 2003, Permit #NEV91022 Nevada Power Company – Reid Gardner Station, Moapa, Nevada*, the NDEP has adjusted the action level for sulfate to account for analytical sensitivity.

The NDEP has established action levels for phosphate, molybdenum, titanium, and vanadium as calculated in Table 1 of the referenced report. Based on the data contained in the Second Quarter 2003 DMR, there are several groundwater monitoring wells at the referenced facility that exhibit concentrations higher than the calculated action levels for these contaminants. In addition, the NDEP has established an action level for boron as calculated in Table 1 of the referenced report since boron is identified as a constituent of the process water at Reid Gardner Generating Station.

Table 1 of the referenced report did not have associated units for the values presented. The NDEP approves the establishment of action levels for the referenced facility as shown in the following table.

Analyte	Action Level mg/L	Analyte	Action Level mg/L
Chloride	520	Iron	0.85
Sulfate	1070	Lead	0.015
TDS	2570	Magnesium	165
Nitrate	10	Manganese	0.27

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Phosphate	0.2	Mercury	0.002
Aluminum	0.32	Molybdenum	0.03
Arsenic	0.16	Selenium	0.05
Barium	2	Sodium	520
Boron	1.4	Titanium	0.01
Chromium	0.1	Vanadium	0.004

As previously mentioned, beryllium, cadmium, and nickel have been omitted from this background analysis. **Please provide background concentration data by October 10, 2003 so that action levels for these contaminants may be established.**

Additionally, the referenced report requested a reduction in the number of monitored analytes and in the frequency of sampling. The NDEP will address these requests in a separate letter after discussions between NDEP – Bureau of Corrective Actions, NDEP – Bureau of Water Pollution Control, and Nevada Power Company have been conducted. Please contact the undersigned if you have any questions or comments about this letter at (702) 486-8267 or sharbour@ndep.nv.gov.

Sincerely,

Shannon Harbour, EI
Staff Engineer
Remediation and LUST Branch
Bureau of Corrective Actions, NDEP

SH:sh

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